



## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

May 15, 2023

s/ D. Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)information associated with a certain Facebook or Instagram user ID that  
is stored at premises owned, maintained, controlled, or operated by Meta  
Platforms, Inc. ("Meta"), a social networking company headquartered in  
Menlo Park, California.

Case No. 23 MJ 93

**APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

Please see Attachment A.

located in the Eastern District of Wisconsin, there is now concealed (*identify the person or describe the property to be seized*):

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 1951(a)	Hobbs Act Robbery
18 U.S.C. § 924(c)	Brandishing a Firearm during a Crime of Violence

The application is based on these facts:

Please see attached Affidavit.

- Continued on the attached sheet.
- Delayed notice of 30 days (*give exact ending date if more than 30 days*: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Heather Wright, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
TELEPHONE (*specify reliable electronic means*).

Date: 5/15/2023

Judge's signature

City and state: Milwaukee, WI

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, Heather N. Wright, being first duly sworn on oath, hereby depose and state as follows:

**INTRODUCTION, BACKGROUND, TRAINING, AND EXPERIENCE**

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook or Instagram user ID that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Meta to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since July of 2010. Since August of 2020, I have been assigned to the FBI’s Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

3. Based on my training and experience, I know that criminal investigations have been aided by subpoenas, warrants, and court orders related to electronic communication records by providing critical investigative leads and corroborative evidence.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on the investigation to date and the facts as set forth in this affidavit, I submit that there is probable cause to believe that HUSSEIN A. HAJI (XX/XX/2001)), HURIA H. ABU (XX/XX/2002), JESSIE L. COOK (XX/XX/2003), ABDI A. ABDI, (XX/XX/2001), DARRION ALLISON and others, committed the armed robberies of United States Post Office mail carriers on October 25, 2022, near 2650 N. Martin Luther King Drive, Milwaukee, on December 7, 2022, near 3205 N. Breman Street, Milwaukee, on February 10, 2023, near 5273 N. 27<sup>th</sup> Street, Milwaukee, and on March 13, 2023, near 4548 N. 38<sup>th</sup> Street, Milwaukee. These offenses are in violation of violations of Title 18 U.S.C. § 1951(a), Hobbs Act Robbery, and Title 18 U.S.C. § 924(c), Brandishing of a Firearm during a Crime of Violence. There is also probable cause to search the information described in Attachment A for evidence of these crimes, as described in Attachment B.

#### **PROBABLE CAUSE**

6. On October 25, 2022, the Milwaukee Police Department responded to an armed robbery complaint at 2650 N. Martin Luther King Drive, Milwaukee, Wisconsin. Upon arrival, officers spoke with the victim, identified as a United States Postal mail carrier, hereinafter referred to as D.D. D.D. stated that he had been conducting his route at approximately 2:30 P.M., and was

about to start at 2500 N. Richards Street, when he was approached by four young males. D.D. described Subject #1 as possibly a Hispanic male, approximately 19 years old. D.D. stated that Subject #1 and three other males, approached him from behind and demanded that he “give up his shit.” D.D. stated that he heard one of the subjects say that they had a gun to his back. D.D. stated that he told the subjects that he was not going to give them anything and quickly turned around to face the attackers, fearing that one of them may have a gun. D.D. stated that he did not observe any of the subjects with a firearm and immediately took a fighting stance. Three of the subjects ran away, while Subject #1 stayed and took a fighting stance as well. D.D. stated that as Subject #1 attempted to punch D.D., D.D. attempted to punch Subject #1. D.D. stated that he was unsure if his punch made contact with Subject #1, however, Subject #1 staggered back and ran away. D.D. stated that Subject #1 ran eastbound and eventually northbound towards the alley. D.D. stated that he chased after Subject #1, however, he lost sight of Subject #1 and returned to his vehicle. D.D. stated that when he returned to his vehicle, he was unable to find his USPS issued Arrow key that had been hanging around his neck on a lanyard.

7. On January 28, 2023, a photo array was presented to D.D. with the target of the photo array as JESSIE L. COOK (dob: 12/22/2003). D.D. identified COOK as the individual that had demanded his things and attacked D.D. on October 25, 2022.

8. On December 7, 2022, the Milwaukee Police Department responded to 3205 N. Breman Street, Milwaukee, Wisconsin, for an armed robbery of a United States postal mail carrier, hereinafter referred to as E.V. E.V. stated that at approximately 3:00 p.m., he had just finished delivering mail to 3219 N. Breman Avenue and was walking south towards the next block when he passed two subjects who were walking northbound on the west sidewalk. E.V. stated that after they had passed, he could hear running footsteps approaching him from behind and he turned

around. The same two subjects that had just passed him ran up to him and one had a gun pointed at him.

9. E.V. stated that Suspect #1 said "Gimme everything..gimme everything...gimme everything," while pointing a small framed semi-automatic hand gun at him. E.V. stated that he provided his ID and keys that were on a lanyard around his neck as well as the mail in his hands. E.V. stated that the key fob for the postal van as well as his Arrow key were on the key ring that was provided. The Arrow key was specifically assigned to E.V. that day and can open the blue mail boxes and some boxes at apartment buildings. E.V. stated that the serial number for the key provided was #30411. E.V. stated that Subject #2 took the ID with the keys attached but dropped the mail E.V. had handed to him. E.V. stated that he attempted to hand the Subjects his mail bag because it had scanned devices within the bag that could be GPS located, however, the subjects were not interested and were only interested in the lanyard and keys. E.V. stated that he then ran to a corner bar for safety and called the police. E.V. stated that the subjects ran southbound and heard a car squeal off in a hurry.

10. Shortly after the incident, a witness approached him and told him that he saw the suspects get into a white Nissan Murano. That particular witness could not stay on scene. However, an additional witness also came forward and stated that they had observed the robbery and corroborated that she, too, had observed the suspects enter a white Nissan Murano.

11. A canvas for video surveillance was completed and video surveillance from a Ring doorbell was obtained at 3219 N. Breman Street. After a review of the video, Subject #1 was observed to be a black, male, late teens, approximately 5'10" tall, thin build, dark complexion, wearing a black hoody, black mask (above eyes showing), light gray pants, black shoes, armed with a black semi-automatic handgun. Suspect #2 was observed to be a black, male, late teens,

approximately 6'0" tall, thin build, medium complexion, wearing a black hoody, black mask (above eyes showing), black pants, white shoes, unknown if armed.

12. On January 27, 2023, a state residential search warrant related to a drug investigation was executed at 2519 N. Buffum Street, Milwaukee, Wisconsin. Prior to the execution, two black males, and two black females were observed leaving the residence in a blue Toyota Camry. Shortly thereafter and just prior to the warrant execution, the blue Toyota returned with two of the four individuals inside. When officers approached the vehicle, they identified the individuals as MARVIN TURNER (dob: XX/XX/2000) and HUSSEIN A. HAJI (dob: XX/XX/2001). Officers then executed the search warrant and identified HURIA H. ABU (dob: XX/XX/2002), JESSIE L. COOK (dob: XX/XX/2001), AMAURIE D. SMITH (dob: XX/XX/2005) as well as two females who were not residents of the house, hereinafter "S. J". and "S. W.". A search of the residence resulted in the recovery of a Glock 19 handgun (stolen out of Cudahy), a loaded Ruger P95 handgun, a loaded Ruger PC Charger carbine pistol, a loaded AK 7.62 cal pistol, a GSG rifle upper with mock silencer, hundreds of pieces (approximately 900 checks) of stolen mail including personal and commercial checks from Milwaukee, Shorewood, Brookfield, Brown Deer, as well as others, checks currently being "washed" in acetone, keys on a bed located in a bedroom that unlocked a safe which contained \$7000, (1) USPS arrow key, (1) set of USPS keys, (20) cellular telephones, and (2) laptop computers. Officers also located keys for a Nissan Murano that unlocked a white Nissan Murano parked outside the residence and matched the vehicle description used in the October 25, 2022 and December 7, 2022 robberies.

13. Following the arrests of HAJI, COOK, ABU, SMITH and TURNER, interviews were conducted. During the interview of COOK, COOK stated to detectives that he was the primary user of the Nissan Murano located at the residence during the execution of the search

warrant. COOK admitted to being involved in the robbery of the postal carrier on October 25, 2022. COOK stated that COOK was the individual that punched the postal carrier during the robbery, however, COOK would not state why the mail carrier was targeted or who he was with during the robbery. COOK stated to detectives that he was the owner of a Samsung Galaxy 20 black cellular phone with telephone number 262-389-0018.

14. During the interview of HAJI, HAJI stated to detectives that he was the owner of a purple Apple iPhone 14 and a yellow Apple iPhone XR with the telephone number 262-364-4059. HAJI stated that his service provider is T-Mobile and that he has had that cellular number for a couple of months. During the interview, HAJI admitted to detectives that he had participated in the robbery of the mail carrier that had occurred on December 7, 2022. HAJI stated that ABU was the driver, and that COOK had the gun and pointed it at the white mail carrier. HAJI stated that they used the Nissan Murano, and that HAJI was the individual that took the arrow key from the mail carrier. HAJI also admitted to Detectives that they were after the specific arrow key that mail carriers carry during the robbery. HAJI stated that HAJI, COOK, and ABU participated in "mail runs", which are when a person removes mail from mailboxes. HAJI stated that he has participated in approximately 40 mail runs in at least four different vehicles. HAJI stated that the target of the mail runs are personal checks and that they sell them after they are located. HAJI stated that one of the methods of payment when selling the checks is CashApp. HAJI stated that the day he was arrested, he was taken into custody outside of the residence because he had been inside the Toyota. Haji stated that his firearm was located inside the Toyota on the passenger side floorboard. HAJI stated that he has owned the firearm for approximately one years and purchased it at the Shooter's club. HAJI stated that the last time he shot the gun was on New year's outside the house at 2519

N. Buffum Street at midnight on New Year's Eve. HAJI stated that he had fired the gun into the air.

15. During the interview of S. J., S.J. stated that she had only been to the house on Buffum twice and that she had seen guns in the house. S.J. stated that she had seen approximately four guns. S.J. stated that she heard SMITH and others talking about a robbery and that S.J. believed they were talking about the robbery of a mailman. S.J. raised her hands up simulating holding a gun and stated that he said "nigga up" or something like that.

16. During the interview of S.W. stated that ABU, COOK and HAJI do "mail runs" in the morning. S.W. sated that she believed that they get checks out of the mail using the arrow key obtained by the postman. S.W. did not know who robbed the mail person to get the key but she believed that ABU, COOK, and HAJI were the ones that did the robbery because they were the ones who do the mail runs. S.W. stated that ABU, COOK, and HAJI take pictures of the checks but she was unsure if it was before or after they put the checks in acetone. S.W. stated that SMITH had been involved with ABU, COOK and HAJI lately and had been riding in vehicles and doing the "check stuff" with them. S.W. stated that SMITH had been staying on the couch at the house.

17. On February 2, 2023, a Wisconsin state search warrant was obtained for all the cellular phones seized during the search warrant executed at 2519 N. Buffum Street. A review of the phones indicated that FBI evidence item 1B1 and evidence item 1B2 were phones associated to HAJI. Evidence item 1B1 was described as an iPhone A2651 14 Pro Max, purple in color with no case with PIN code "000000". Evidence item 1B2 was described as an iPhone XR A1984, gold in color, with PIN code "2900". A review of evidence item 1B1 and 1B2, were consistent with photos and instant messages associated to HAJI. Numerous messages located within HAJI's phone indicated that HAJI had obtained an arrow key, was using the arrow key to open mailboxes, steal

personal checks from unwilling victims, and re-writing the checks to bank accounts associated to HAJI or another that HAJI had recruited to deposit the stolen check. Also, during the review of the phones, it was determined that HAJI used Instagram Account “Scamily Sain” with **username “2900scamily.sain”** and Facebook **display name “Sain Otw”** with **Facebook ID #100008186230246**. The following was a message associated to HAJI’s Instagram:

Scamily Sain (money emoji): “Okay I’ll ship 2 slips out for you today they will get thru by Thursday once they get to you wash the slip off and rewrite it your self before you atm Deposit it.” 12/20/2022 10:51:14 AM (UTC-6)

Scamily Sain (money emoji): “I have the arrow keys to the collection box so I get these slips in daily.” 12/20/2022 10:51:14 AM (UTC-6)

18. I know that the term “slips” to mean a stolen personal or commercial check written out by a victim sending to another through the mail. I also know that the phrase “washing the slip” means that the subject uses acetone to erase the name in the “To” line of the check in order to readdress the name to another subject.

19. Additional a review of 1B1 identified a Facebook profile Jas Kashlyy with **Facebook ID: 100044617834049**. I observed numerous conversations within 1B1 with HAJI using this Facebook profile. This Facebook profile appeared to be HAJI posing as a female in order to solicit bank account information from Facebook members and to deposit stolen checks into their accounts. During the interview of HAJI, HAJI admitted to soliciting individuals via Facebook for that purpose and splitting the proceeds of the deposit with the individuals. The following was a message located in HAJI’s phone from Jas Kashlyy to an individual on Facebook with the display name of “Brittany Taylor”:

Jas Kashlyy: "No I can ship the card to my self so I can atm deposit the check?. It will clears the next day for us." 1/14/2023 7:40:19 PM(UTC-6)

Jas Kashlyy: "It's a slip not a fake check so it won't close nor effect your account" 1/14/2023 7:41:36 PM(UTC-6)

Jas Kashlyy: "I have the \$8k slip already ready for the account (emoji)" 1/14/2023 7:42:20(UTC-6)

Brittany Taylor "Okay so with split it and I get 3500 and you get 4500" 1/14/2023 PM(UTC-6)

Brittany Taylor "how many times can you do it" 1/14/2023 7:43:40 PM(UTC-6)

Brittany Taylor "What's your address do you want me to mail my card to you?" 1/14/2023 9:01:57 PM(UTC-6)

Jas Kashlyy: "Yes can you do that for me?" 1/14/2023 9:02:16 PM (UTC-6)

Jas Kashlyy: "2546 N 37<sup>th</sup> St, Milwaukee, WI 53210" 1/14/2023 9:02:51 PM (UTC-6)

20. I know that the address of 2546 N. 37<sup>th</sup> Street, Milwaukee, was an address associated to ABU's family and ABU's home address when he was arrested on April 24, 2023.

21. Also referenced in associated accounts in HAJI's phone was an additional Facebook profile with the same persona and profile picture of the same female. This Facebook account, with **username**" Jas Kashlyy" and **Facebook ID: 100064792601038**, was publicly available with the most recent public activity of February 5, 2023. I located the Facebook profile and observed the most recent post to be the following::

"No money needed (exclamation emoji) Bring them bank accounts don't matter if they negative Im loaded them up (emoji)"

22. There was also an Instagram account which was associated to the same persona saved on HAJI's phone with an Instagram **username** "jaskashlyy" and **Instagram ID: 3472618868**.

23. A review of 1B1 determined that ABU utilized the **Instagram username: riodinero.jr** with the **Instagram ID# 31452828829** (this account was located by FBI analysts and a photo of Shoes with money as the profile picture was observed) and **Instagram Account username "Rio.Dinerojr"**. There were multiple messages observed between HAJI and the accounts associated to ABU, however, some of the text within the chats appeared to have been deleted and others were documented audio calls. It was also determined that ABU used the Facebook profile **username "riodinero"** with a **Facebook ID: 100052788074944** and Facebook profile **username "riodinerojr"** with a **Facebook ID: 100024805427241**. I located the Facebook page associated to **Facebook ID: 100052788074944** on May 10, 2023 and it appeared to have been deleted. I also located the Facebook page associated to **Facebook ID: 100024805427241** and the last available post was on April 24, 2023.

24. A review of 1B1 determined that ABDI ABDI utilized the **Instagram account "mamba\_4200"** with **Instagram ID# 51476302810** (this account was located by FBI analysts and had a most recent publicly available activity of March 15, 2023), Instagram account "certified\_pearler" (this account was located by FBI analysts and was publicly available. The most recent activity publicly available was on March 20, 2023. Photos of ABDI and HAJI were observed on the account), and **Facebook account "Abdi Abdi"** with **Facebook ID# 100064318060237** (this account was located by FBI analysts and was publicly available. The most recent activity publicly available was on April 23, 2023. A video posted to this account was observed and ABDI was observed in the video).

25. During the interview of S. J., S.J. stated that she had only been to the house on Buffum twice and that she had seen guns in the house. S.J. stated that she had seen approximately four guns. S.J. stated that she heard SMITH and others talking about a robbery and that S.J. believed they were talking about the robbery of a mailman. S.J. raised her hands up simulating holding a gun and stated that he said "nigga up" or something like that.

26. During the interview of S.W., S.W. stated that ABU, COOK and HAJI do "mail runs" in the morning. S.W. sated that she believed that they get checks out of the mail using the Arrow key obtained from the mail person. S.W. did not know who robbed the mail person to get the key but she believed that ABU, COOK, and HAJI were the ones that did the robbery because they were the ones who do the mail runs. S.W. stated that ABU, COOK, and HAJI take pictures of the checks but she was unsure if it was before or after they put the checks in acetone. S.W. stated that SMITH had been involved with ABU, COOK and HAJI lately and had been riding in vehicles and doing the "check stuff" with them. S.W. stated that SMITH had been staying on the couch at the house.

27. On February 10, 2023, the Milwaukee Police Department responded to an armed robbery that had occurred near 5273 N. 27<sup>th</sup> Street, Milwaukee, at approximately 11:40 A.M. The victim was identified as a United States Postal carrier, hereinafter referred to as N.M. N.M. stated that N.M. had been working mail route 88, had parked his mail vehicle near 2626 W. Rhor, and walked to the door to deliver the mail. N.M. stated that as he began to approach the residence of 5273 N. 27<sup>th</sup> Street from the north, he walked onto the small porch to place mail into the boxes. N.M. stated that he then observed three subjects come from the backyard (from the west of where he was) and surrounded him as he was on the porch. N.M. stated that he was somewhat trapped due to the railings on the porch and the three subjects surrounding him. N.M. stated that he had

the ring of apartment keys in one pocket of his outer most jacket and the chain was exposed across his jacket leading to the Arrow key that was in the opposite pocket of his jacket.

28. N.M. described Subject #1 as a black male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, aviator sunglasses with plastic frames and gray/black lenses, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine. N.M described Subject #2 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck with his eyes exposed, "beach style" square sunglasses, a black hooded sweatshirt, dark blue jeans, unknown shoes, armed with a black Glock 9mm handgun with a tan extended magazine and switch attached to the back of the gun. N.M. stated that N.M. knew the term "switch" to be an added part on a gun that makes the firearm fully automatic. N.M. described Suspect #3 as a black, male, approximately 22-27 years old, over 6'0" tall, medium brown complexion, wearing a black ski mask covering his head, face and neck, with his eyes exposed, a black hooded sweatshirt, dark jeans, unknown shoes, armed with a black Glock 9mm handgun with an extended magazine.

29. N.M. stated that Suspect #1 was armed with a gun which he held at his side when he demanded N.M.'s keys. N.M. stated that he held up his hands while Suspect #1 grabbed the chain that was exposed outside of his jacket and took N.M.'s keys. N.M. stated that Suspect #2 approached him, used his gun to push up the brim of N.M.'s hat, and asked N.M. what else he had. N.M. stated that he told the suspect that he didn't have anything else. N.M. stated that Suspect #3 did not say anything to him or touch him, but was armed with a gun in his waistband and positioned himself with the other two Suspects. N.M. stated that after the suspects obtained N.M.'s keys, all three suspects fled on foot in the same direction they had approached. N.M. stated that he heard

car doors opening and a vehicle drive away but he did not look into the alley to obtain a vehicle description nor which direction they fled.

30. A canvas for surveillance video was conducted and Ring video was located at 5248 N. 27<sup>th</sup> Street as well as surveillance video from 2800 W. Custer Ave. During the collection of the Ring video, officers were able to observe at 11:41AM, a white 2007-2012, 4 door, Nissan Altima driving southbound through the alley at a high rate of speed. The vehicle had tinted windows (including front window brow only), a sunroof, side window deflectors, six spoke aluminum rims (split spokes), damage to rear passenger bumper/quarter panel, damage to front passenger quarter panel, dual exhaust, and front and rear unknown registration plates. During a review of the surveillance video obtained from 2800 W. Custer, Officers observed the white Nissan Altima approach the alley at 11:38 A.M., from the west and drive southbound in the alley. Multiple suspects can be observed exiting the vehicle and proceed towards where the victim was robbed. The white Nissan continues southbound in the alley following the incident.

31. On February 13, 2023, at approximately 2:52 PM., a law enforcement member of the Milwaukee Area Violent Crimes Task Force (MAVCTF) observed a vehicle matching the above description driving west on North Avenue from 73<sup>rd</sup> Street. The vehicle was a 2010 Nissan Altima 4 door (WI plate AJF-7039). The vehicle subsequently pulled into the Brother's Plus Grocery Store located at 4020 W. North Avenue. Task Force Officers (TFOs) observed a thin black male with shoulder length dreads exit the vehicle's front passenger door and enter the business. The subject was wearing a black T-shirt, camouflage pants, and white/black shoes. The subject then exited the store and re-entered the Altima's front passenger door. TFO Strasser obtained a short video of the subject during the course of the surveillance.

32. The vehicle was then observed driving to and parking in the rear 2225 N. 35<sup>th</sup> Street. Task Force Officers were able to run the plate and noted that the vehicle listed to ABDI BABA (dob: 01/01/1998), with an address of 2303 W. Cherry Street. This same vehicle was observed via a law enforcement camera system at West Silver Spring Drive and North Green Bay Avenue on February 10, 2023, at 11:08 A.M. The robbery occurred on February 10, 2023, at approximately 11:41 A.M and is 0.9 miles away from the West Silver Spring Drive and North Green Bay Avenue intersection.

33. Task Force Officers were aware that there were several armed robberies of United States Postal carriers of their Arrow keys in recent months and that a search warrant had been executed on January 27, 2023. Task Force Officers were also aware that following the search warrant, several subjects were taken into custody and released, including HURIA H. ABU. ABU had been interviewed by MAVCTF TFO Brendan Dolan following his arrest while in custody. TFO Dolan was shown the short video clip of the surveillance of the subject that was observed getting in and out of the Nissan Altima. TFO Dolan was able to identify the subject as ABU, based on his prior interactions with him.

34. On February 14, 2023, a state search warrant was obtained for a GPS tracker in order to identify location information for the 2010 Nissan Altima 4 door (WI plate AJF-7039), identified by law enforcement as the suspect vehicle in the February 10, 2023, armed robbery. On Friday March 3, 2023, a GPS was attached to the vehicle and the GPS began providing location information. Along with officers observing and locating the vehicle at 2303 W. Cherry Street in order to place the GPS onto the vehicle, during the monitoring of the GPS, Task Force Officers have observed the vehicle and monitored the vehicle's GPS location at the Cherry Street address on numerous occasions.

35. On March 13, 2023, Law Enforcement members of the MAVCTF and Milwaukee Police Officers responded to an armed robbery of a United States Postal carrier near 4548 N. 38<sup>th</sup> Street, Milwaukee. The victim, identified and hereinafter referenced as M.P., stated that at approximately 1:00 p.m., he parked his truck at 4501 N. 38<sup>th</sup> Street on the west side of the street, facing south. M.P. stated that while delivering mail at 4514 N. 38<sup>th</sup> Street, he observed two black male suspects on the west side of the street walking southbound. M.P. stated that the two seemed suspicious because they had masks on. M.P. stated that the two suspects walked past his truck, then walked in front of his truck eastbound. The suspects then went north on the east side of N. 38<sup>th</sup> Street. M.P. stated that he later observed them duck by the houses near 4518 N. 38<sup>th</sup> Street while he was further north delivering mail.

36. M.P. stated that when he got near 4548 N. 38<sup>th</sup> Street, he observed the two suspects running at him. M.P. described Suspect #1 as a black, male, approximately 16 years old, approximately 5'4" tall, short, thin build, wearing a dark royal blue coat, black running pants, armed with a Draco styled gun with a wooden stock. M.P. described Suspect #2 as a black, male, approximately 6'0" tall, light complected, wearing a black jacket and black jogging pants. M.P. stated that one of them stated "don't run now bitch." M.P. stated that Suspect #1 pointed the gun at his head and said, "Give me the keys. Give me the keys. I'll shoot you." M.P. stated that they tried grabbing his keys from the right side of him, but they were on a lanyard. M.P. stated that he told them that the keys were on a lanyard, so they unclipped them and ran northbound from the location and continued eastbound on W. Glendale.

37. A witness to the incident, hereinafter P.M., stated that she heard talking outside and looked out her front window and observed the postal carrier running. She stated that she got up to the storm door and observed two suspects, one of which had a gun pointed at the postal carrier and

was wearing a blue coat. P.M. stated that she heard the postal carrier say "ok..ok" but did not hear what the suspects were saying. P.M. stated that she then grabbed her three-year-old nephew and pulled him to the ground for fear that shots would be fired. P.M. stated that she waited for the suspects to leave and called the police.

38. Video surveillance was obtained from the Hopkins Food Mart located at 4601 N. Hopkins Street, Milwaukee. The cameras were located on the south side of the business and the east side of the business. MACTF investigators observed a 2009 silver Honda Civic with front and rear plates, no sunroof, damage to front driver's quarter panel, 7 spoke hubcaps, broken front driver hubcap, with the front passenger inner headlight on (others defective), circling the block and fleeing the area of the robbery, just after it took place.

39. An attempt to identify the vehicle was conducted by querying FLOCK and ALPR cameras in the area with a similar suspect vehicle description. A hit on a 2009 Honda Civic 4 door, WI plate ABG-8200, was obtained at several times on March 13, 2023 at the following locations:

- a. 16:26 – 21 SWE W. Fond Du Lac at Capital Ave.
- b. 13:36 – #01 N/B Port Washington @ Hampton Ave
- c. 12:19 – #10 MLK & W North – S/B
- d. 11:42 – 25 S/B N. Sherman at W Hampton
- e. 8:33 – 07 S/B N. 35<sup>th</sup> Street at W. Wisconsin

40. The vehicle listed to a Mohammed F. Omar (dob: XX/XX/1990) of 1809 W. McKinley Avenue, Milwaukee.

41. A Milwaukee Police database query was then done for the Wisconsin plate ABG-8200. A call for service regarding a subject with a gun and shots fired was received on January 2, 2023 near North Buffum Street and East Wright Street. A second caller then called and reported

that her house had been struck by gunfire at 2513 N. Buffum Street. Officers responded and ran all vehicles in the area including a silver 2009 Honda Civic, WI plate ABG-8200, which was parked in front of 2519 N. Buffum Street (next door to 2513 N. Buffum, and also struck by the gunfire) when officers arrived. A body camera review of the responding officer was reviewed by investigators and the 2009 silver Honda was also observed driving by the officer at 10:42 a.m. on January 2, 2023.

42. On March 14, 2023, an offline search of the 2009 Honda Civic, WI plate ABG-8200, was done and on December 19, 2022, the vehicle was run by Whitefish Bay Police Department. Your affiant contacted Whitefish Bay Police Department on March 14, 2023 and confirmed with Whitefish Bay Detective Joe McLeod that the vehicle was traffic stopped on December 19, 2022 at 9:48 p.m., at the intersection of Santa Monica and W. Silver Spring Drive in Whitefish Bay, for speeding, driving without a license, and failure to stop at a stop sign. The driver of the vehicle was identified as HURIA H. ABU, dob: XX/XX/2002. ABU provided Whitefish Bay with a home address of 2519 N. Buffum Street. During a review of the body cam of Whitefish Bay officers during the traffic stop, ABU can be observed speaking with officers in the driver's seat of the vehicle. During the interaction, ABU was observed holding a cellular telephone with a red case. ABU provided officers with the cellular telephone in order to provide a photo of his identification card. Again, the cellular telephone can be seen being handed to the Whitefish Bay officer by ABU in a red case. The cellular telephone is then handed back to ABU by the officer. ABU also provided officers with his home address of 2519 N. Buffum Street in Milwaukee.

43. Following the arrest of COOK, ABU, SMITH, TURNER, and HAJI, on January 25, 2023, only COOK and HAJI were held in state custody. All others were released and on

February 10, 2023, the next robbery of a United States Postal carrier for his Arrow key occurred. The suspect vehicle in that robbery was the 2010 Nissan Altima 4 door (WI plate AJF-7039) registered to BABA who is associated to ABU. ABU was observed on February 13, 2023, exiting the Altima during a law enforcement surveillance. The suspect vehicle of the United States Postal carrier robbery on March 13, 2023 was identified as a 2009 Honda Civic 4 door (WI plate ABG-8200). ABU was stopped by Whitefish Bay Police Department on December 19, 2022, driving this suspect vehicle.

44. On March 24, 2023, surveillance was conducted by the FBI Surveillance Operations Group of the 2009 silver Honda Civic. FBI SOG members observed the driver of the vehicle, later identified as ABDI A. ABDI, dob: XX/XX/2001, exit the Honda Civic at the Fast and Friendly Grocery Store located at 311 W. Locust Street, Milwaukee. FBI SOG members observed ABDI exit the location and return to his vehicle. While walking to his vehicle, FBI SOG members took photographs of ABDI exiting the location and were able to observe what appeared to be registration plates and a registration sticker in his left hand.

45. Later that same day, a traffic stop of the silver 2009 Honda Civic was conducted by the Milwaukee Police Department for expired registration tags affixed to the vehicle. The driver of the vehicle was identified as ABDI, indicated to officers, that the vehicle was registered in his name and had just obtained new plates and registration for the vehicle. ABDI indicated that the new plates for the vehicle were WI plate ASV-4406. Officers observed two other occupants inside the vehicle and identified the individuals as ABU and DARRION M. ALLISON, dob: XX/XX/2000. While officers were obtaining contact information for the individuals inside the vehicle, ABU indicated that his telephone number was 262-264-0206, ABDI indicated that his

telephone number was 262-283-2100, and ALLISON indicated that his telephone number was 414-588-5392. Officers then released the vehicle without incident.

46. On March 27, 2023 at 12:20 am, Butler Police Department (BPD) Officer Knapp observed a suspicious vehicle, later identified as a silver 2009 Honda Civic, parked on the west side of N. 125<sup>th</sup> Street facing south with a defective head lamp and dark tinted windows. Officer Knapp ran the registration of the vehicle, WI plate ASV-4406, and the registered owner came back to ABDI, with a listed address of 5230 N. Sherman Blvd #23 in Milwaukee. A DOT check of ABDI revealed that ABDI had a suspended license for a failure to pay a forfeiture.

47. Officer Knapp turned his marked squad around and the vehicle pulled away from its parked position southbound N. 125<sup>th</sup> Street towards W. Hampton Avenue. As he was attempting to catch up to the vehicle to conduct a traffic stop for an equipment violation, Officer Knapp observed a male subject, later identified as ABDI, running from west side of N. 125<sup>th</sup> Street across N. 125<sup>th</sup> Street, eastbound in the alley behind Butler Auto Care, 12432 W. Hampton Avenue and south of 4820 N. 125<sup>th</sup> Street. While checking the area, Officer Knapp located ABDI and the other male subject, identified verbally as DARRION M. ALLISON, dob: XX/XX/2000, walking northbound on the west side of the street through the snow along N. 124<sup>th</sup> Street in front of 4935 N. 124<sup>th</sup> Street.

48. After losing sight of both subjects, Officer Knapp regained eyes on the subjects and made contact with the individuals, who verbally identified themselves as ABDI and ALLISON. ALLISON told Officer Knapp that they were trying to get to the store. Officer Knapp then spoke to ABDI and asked why someone was driving his vehicle. ABDI told Officer Knapp that everyone was “good” and indicated that his cousin was driving his vehicle with his permission. Upon obtaining ABDI and ALLISON’s identifying information, ABDI stated that his telephone number

was 262-283-2100 and ALLISON indicated that his telephone number was 414-588-5392. Officer Knapp then indicated to ALLISON and ABDI that they were free to leave.

49. After ABDI and ALLISON were released, Officer Knapp, again checked the area and observed the suspicious 2009 Honda Civic return. Officer Knapp activated his emergency lights and conducted a traffic stop on N. 125<sup>th</sup> Street, just south of W. Stark Street. Officer Knapp made contact with the driver, identified as HURIA H. ABU, dob: XX/XX/2002, and informed him of the reason for the traffic stop. Officer Knapp smelled a strong odor of marijuana inside the vehicle. ABU stated that he was in the area to obtain gas and that he was just “chilling” there and that “I always park right here.” Prior to walking back to his squad vehicle, ABU told Officer Knapp that Officer Knapp could check the vehicle out. Officer Knapp then searched the vehicle via consent from ABU. Officer Knapp located a box of blue latex gloves, 21.9 grams of a green leafy substance that later field tested positive for THC, a black and multicolor backpack containing a black Nike ski mask and (17) personal checks made out to various individuals issued from various individuals, most of whom resided in the City of Milwaukee. Officer Knapp also located (55) unused “cannabis flower” Ziplock bags, a box of 9mm Federal ammunition containing (20) unused round, a black and red digital scale, and (2) additional checks in the glovebox along with (2) money orders totally \$150 USC.

50. Officer Knapp also located (4) Apple iPhones inside the vehicle. One of the Apple iPhones had a red/black case with ALLISON’s driver’s license in the case pocket on the back side of the phone. The second iPhone (blue back with no scratches or cracks) was in the same spot that ALLISON’s iPhone was located. This phone appeared to be brand new and not set up. The third phone was an iPhone that had a silver back with no case. This was the cellular phone on ABU’s person when he exited the vehicle and placed it on the trunk of the vehicle. When the home screen

turned on, there was picture of ABU wearing a white T-shirt with black pants holding money. The fourth iPhone located, had a blue cracked back and pieces missing along with the lower front screen that was cracked. This phone was on the front passenger seat. There were no identifying serial numbers or model numbers observed on the outside of this phone. This phone was not in a case.

51. Following the search of the vehicle. ABU was taken into custody and cited for possession of marijuana as well as possession of drug paraphernalia. ABU was transported to the Waukesha County Jail for booking and then released.

52. Later that day, on March 27, 2023, Officer Knapp went back to the area of the location where ABDI and ALLISON had been questioned and observed (2) blue latex gloves on the east side of 4935 N. 124<sup>th</sup> Street. One of the blue latex gloves was located on the south side of the driveway entrance and the second glove was located on the north side of the driveway entrance.

53. On March 28, 2023, after speaking with your affiant about the circumstances regarding the investigation on ABU as well as others, BPD Captain Brian Zalewski obtained video surveillance from the Village of Butler Town Hall. Captain Zalewski reviewed Village of Butler Town Hall security cameras during the timeframe of Officer Knapp's contact with ABU, ALLISON and ABDI. At 12:18:30 AM, the camera activated (as it is motion censored) as two subjects were observed next to, on the north side of, the blue mailbox in front of the Post Office. One subject was squatting down and appeared to be tampering with the bottom half of the mailbox. The second subject, who was the taller of the two, was standing behind the first subject. It should be noted that the blue mailbox had the lock and key access on the lower half of the side of the box facing north. At 12:18:32 AM, the subject squatting down stands up and both subjects began to walk towards N. 125<sup>th</sup> Street. The camera stopped recording at 12:18:45 AM.

54. Following a review of video surveillance, Captain Zalewski contacted the post master of the Butler Post Office, Karen Monreal, located at 12420 W. Hampton, one block from where the 2009 Honda Civic was parked the previous morning when ABU was arrested. Captain Zalewski stated that Monreal stated that the top of the bin in the front mailbox contained numerous small packages, election ballots, and a small amount of mail located underneath the packages, however, based on her many years of experience working at this post office, the bin in the mailbox would normally be overflowing after the weekend. On that day, she considered the amount of mail lighter than the normal load.

55. On March 28, 2023, prior to returning the aforementioned cellular phones that were recovered from the Honda Civic to their owners, Captain Zalewski called the telephone numbers provided by ALLISON and ABDI and the associated cellular telephone did ring and confirm that the cellular number provided by ALLISON and ABDI, were indeed, the telephone numbers assigned to those cellular telephones.

56. On April 23, 2023 and into April 24, 2023, Members of the Milwaukee Area Violent Crimes Task Force were involved in the surveillance of known mailboxes that have experienced mail thefts. Postal Inspector Chris MASSARI provided information that the mailboxes at 5995 N Teutonia Ave (City and County of Milwaukee) and 5521 W Center St (City and County of Milwaukee) had both been targeted and had mail stolen from them.

57. On April 23, 2023, at approximately 11:15PM, officers observed two males running eastbound on W Florist Ave towards N Teutonia Ave where there were known USPS mailboxes. Suspect 1 was tall, possibly 6'00" to 6'03" with a medium build, wearing dark pants, a dark hooded sweatshirt with the hood up, and possible writing on the front of the sweat shirt. Suspect 1 was

later identified as ALLISON. Suspect 2, was short, possibly 5'05" to 5'07" wearing what appeared to be an Adidas jacket or sweatshirt. The jacket or sweatshirt was dark or black with stripes going down the shoulders ending at approximately the elbow area. Suspect 2 was later identified as ABDI.

58. ALLISON acted as a lookout as ABDI crouched down and opened the mailbox located at 5995 N Teutonia Ave. The mailboxes can only be opened with an Arrow Key. The suspects removed what appeared to be mail from the mailbox and then fled westbound on W Florist Ave where they got into a vehicle parked on the south side of W Florist St in the 3400 block and then fled westbound in a dark colored Chevrolet Malibu, with no rear plate.

59. At approximately 12:00AM, FBI Analyst Emily SLAJUS observed via a live stream video feed, the same two subjects go to the mailboxes at the post office located at 5521 W Center St, in Milwaukee, open the mailboxes, appear to take the mail, and then flee. FBI Analyst Slajus then communicated this to undercover MAVCTF surveillance units. Task Force Officer Michael SKEMP (Brookfield PD) and Special Agent Ian BYRNE were in an undercover vehicle and were travelling north on Sherman Blvd from W Wright St and responded to the area. TFO SKEMP called out the vehicle over Milwaukee Police Radio and a traffic stop was conducted.

60. The driver of the vehicle was identified as ALLISON and the front passenger seat was identified as ABDI. ABDI and ALLISON were arrested and taken into custody without incident. Following a search of ALLISON's person for officer safety, an Arrow Key with serial number 77-32733 on it was located in ALLISON's front left pocket which matched the key stolen during the March 13th armed robbery. The Chevrolet Malibu's listed owner was ABU and was registered to the address of 2519 N Buffum Street. Inside of the glovebox of the Malibu were two

pieces of mail addressed to ABU. A search of the vehicle was conducted by members of the MAVCTF. In the front passenger seat, where ABDI had been seated, were two large black plastic garbage bags containing approximately 400-500 pieces of mail, multiple bank cards, two personal checks, and a box of black garbage bags in the trunk of the vehicle.

61. On Monday, April 24, 2023, members of the MAVCTF observed ABU exit the Clark gas Station located at 2242 N. 12<sup>th</sup> Street in Milwaukee and enter a light blue Chrysler 200 with no plates. ABU was observed entering the driver's seat of the vehicle and drove east on North Avenue. A traffic stop of the Chrysler was conducted and ABU was taken into custody without incident.

62. In a Mirandized interview, ALLISON admitted to being a part of the robbery on March 13, 2023 at 4548 N 38th St in the City and County of Milwaukee. He said that robbery occurred because a few nights prior ABDI was using a different Arrow Key to get mail from mailboxes and the key broke off in the mailbox. ALLISON stated ABU was extremely upset about this and threatened ABDI to get another key. ALLISON explained ABU was known as "The Don" and was the leader of this group that steals mail, alters and cashes checks and robbed mail carriers for their USPS Arrow Keys. ALLISON stated that they refer to ABU as "the Don" but ABU preferred to be called "Wiz.". Following ALLISON's arrest, ALLISON's phone was recovered in the console of the vehicle and during the search of the vehicle, ALLISON was receiving a number of missed telephone calls from an individual saved in ALLISON's phone as "Wiz". ALLISON stated he believed that ABU would have hurt or killed ABDI if he did not get a new key.

63. ALLISON further stated that on March 13, 2023 he had met up with ABDI, ABU, LAZARUS JONES and DESHAWN ROBINSON. ALLISON stated that he was driving the

Honda and ABDI was in the back seat while ABU followed them in a Malibu. ALLISON stated that they drove around and eventually found a mail carrier. ALLISON stated that ABU then got into the Honda and JONES got into the Malibu. ALLISON stated that they then circled back around and he (ALLISON), ABDI, and ROBINSON went and robbed the mail carrier at gunpoint. ALLISON stated that ABDI had a Draco styled pistol that had been provided by ABU. ALLISON said ABDI found the key in the mail carriers' bag and pulled them out. After taking the keys, ALLISON stated that ABDI "racked" the Draco AK-47 and was scared that ABDI was going to shoot the mail carrier. ALLISON stated that they ran back to the vehicle after doing the robbery. ALLSION stated that as soon as they entered the vehicle, ABDI handed over the Arrow Key and the Draco styled pistol back to ABU. ALLISON stated that ABDI and ABU were all laughing about the robbery then. ALLISON said they did the robbery under the direction of ABU.

64. In a mirandized interview, ABU admitted to being present for the March 13th armed robbery and admitted knowing there would be a robbery for an Arrow Key. ABU also admitted to being the driver and look out during the December 7, 2022 armed robbery. ABU further admitted being present for the February 10, 2022 armed robbery and acknowledged that an Arrow Key was taken. ABU stated several times during the interview that he did not commit the robberies but that he was "party to a crime." ABU provided a consent to search for the cellular phone that was seized from his person at the time of his arrest.

65. Following his arrest, ABU's jail calls were monitored by members of the MAVCTF. During one of the monitored jail calls, ABU references his Instagram Accounts to a female caller in an attempt to have her login. ABU stated that his Instagram account **username** was "**29.wiz**". It was determined that this Instagram account had an **Instagram ID#** "**31452828829**". This profile was publicly available and had a most recent public activity of June

2, 2022.

66. On May 9, 2023, I reviewed the contents of the cellular phone associated to ABU. ABU's messages and associated social media accounts were observed. I identified ABU to utilize several social media accounts including Instagram Account **username “john.banks981”** with **Instagram ID# “50919630116”**, Instagram Account **username “fraud.corruption”** with a **Instagram ID# 47163873660**” (this account was located by MAVCTF analysts and had a most recent publicly available activity on March 15, 2023), Instagram Account **username “29.wiz”** with **Instagram ID# “31452828829”**, Instagram Account **username “riodinero.jr”**, Instagram **username “1am.ri0”**, and **Facebook ID 100024805427241** (which corresponds to the Facebook Account “Rio Dinero Jr” identified as associated to ABU from the search of HAJI’s phone following the executed search warrant at Buffum Street on January 27, 2023).

67. On April 11, 2023, a federal grand jury in the Eastern District of Wisconsin, issued a two-count indictment against HAJI for violations of Title 18, United States Code, Sections 1951(a) and 2(a) and Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a). Following his indictment, a proffer interview of HAJI took place on May 8, 2023. During that interview, HAJI stated that that ABU, ABDI, COOK, and HAJI, all communicated via voice calls and chats through Instagram. HAJI identified his Instagram as **“2900Scamily.Sain”**, his Facebook Account as **“Sain OTW”**, ABU’s Instagram Account name as **“rio.dinerojr”**, ABU’s Facebook as **“rio dinero jr”**, COOK’s Instagram as **“BMSM\_east”**, ABDI’s Instagram as **“ABScamily”** and ABDI’s Facebook Account as **“Abdi Abdi”**.

68. On May 11, 2023, social media analysis was conducted to ensure all social media accounts associated with the listed actors were identified. Through an Instagram followers review

of each known actor as well as co-actors, I located an Instagram Account **username** “**riodinero.jr\_**” with **Istagram ID: 593929771183**. This account had the exact same profile picture as the Instagram username “**riodinero.jr**” associated to ABU and references the tag “**@fraud.corruption**” which was another Instagram Account identified associated to ABU. The username “**riodinero.jr\_**” was also a follower of ABU’s previously identified Instagram “**riodinero.jr**” as well as an Instagram account previously identified as associated to ABDI with the username “**certified\_pearler**”.

### **INSTAGRAM AND FACEBOOK ACCOUNT PRESERVATIONS**

69. On April 28, 2023, a request for preservation of records for the Facebook account associated to HAJI, identified as **Username: Sain Otw**, and **Account ID: 100008186230246**, and the Instagram account associated to HAJI, identified as **Instagram Account: Scamily Sain** with **Username: 2900scamily.sain**, was submitted via the Facebook LE portal. The Account was publicly available and therefore any user was able to view the content of the account. Photos found throughout the photo album were also consistent with the same physical characteristics of HAJI.

70. On May 10, 2023, a request for preservation of records for the Facebook account used by HAJI under a female persona “Jas Kashlyy”, identified as **Facebook ID: 100044617834049**, **Facebook ID: 100064792601038**, and for the Instagram **username** “**jaskashlyy**” and **Instagram ID: 3472618868**.

71. On April 28, 2023, a request for preservation of records for the Instagram account associated to ABDI, identified as “**mamba\_4200**” with the **Instagram ID# 51476302810**, and Facebook account associated to ABDI, identified as **Username: “Abdi Abdi”** with a **Facebook ID: 100064318060237**, was submitted via the Facebook LE portal.

72. On April 28, 2023, a request for preservation of records for the Instagram account associated to ABU identified as the Instagram account with the **Instagram ID# 31452828829**, was submitted via the Facebook LE portal. This is believed to be the same Instagram profile as the Instagram Account identified in HAJI's phone belonging to ABU with the **username: riodinero.jr**. On May 9, 2023, a request for preservation of records for the Instagram account **username riodinero.jr** was submitted via the Facbook LE portal. On April 28, 2023, a request for preservation of records for the Instagram Account with the **username: fraud.corruption** with a **Instagram ID# 47163873660**, Instagram Account **username: "29.wiz"** with **Instagram ID# 31452828829**, and Facebook Account **username: Rio Dinero Jr** with **Facebook ID: 100024805427241**, was submitted via the Facebook LE portal.

73. On May 9, 2023, a request for preservation of records for the other Instagram accounts associated to ABU, identified as Instagram **username: 1am.ri0**, and Instagram Account **username: "john.banks981"** with **Instagram ID#: 50919630116**, was submitted via the Facebook portal.

74. On May 9, 2023, 2022, a request for preservation of records for the Instagram account associated to COOK, identified as **Instagram Account username: "bmsm\_east"**, was submitted via the Facebook LE portal

75. On May 11, 2023, request for preservation of records for the Instagram account associated to COOK, identified as **Instagram Account username: "riodiner.jr\_"**, was submitted via the Facebook LE portal

#### **TECHINICAL INFORMATION**

76. Based on my training and experience, I am aware that individuals involved in criminal activity, including violent offenses with firearms, have also used websites and third-party

applications, such as Facebook and Instagram, to communicate regarding their illegal activity and flaunt illegal firearms.

77. Meta Platforms, Inc. owns and operates the free-access social networking websites called Facebook and Instagram that can be accessed at <http://www.facebook.com> and <http://www.Instagram.com> respectively. Facebook/Instagram allow its users to establish accounts with Facebook/Instagram, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook/Instagram users, and sometimes with the general public.

78. Facebook/Instagram asks users to provide basic contact and personal identifying information to Facebook/Instagram, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook/Instagram passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook/Instagram also assigns a user identification number to each account.

79. Facebook/Instagram also collects and retains information about how each user accesses and uses Facebook/Instagram. This includes information about the IP addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations.

80. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if "added" to the primary account, can switch between the associated accounts on a device without having to repeatedly log in and log out.

81. Instagram users can also connect their Instagram and Facebook accounts to use certain cross-platform features, and multiple Instagram accounts can be connected to a single Facebook account. Instagram accounts can also be connected to certain third-party websites and mobile apps for similar functionality. For example, an Instagram user can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a connected Facebook account, or transfer an image from Instagram to a connected image printing service. Facebook maintains records of changed Instagram usernames, associated Instagram accounts, and previous and current connections with accounts on Facebook and third-party websites and mobile apps.

82. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the request, then the two users will become “Friends” for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user’s account includes a list of that user’s “Friends” and a “News Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

83. Instagram users can “follow” other users to receive updates about their posts and to gain access that might otherwise be restricted by privacy settings (for example, users can choose whether their posts are visible to anyone or only to their followers). Users can also “block” other users from viewing their posts and searching for their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen their comments. Instagram also allows users to create a “close friends list” for targeting certain communications and activities to a subset of followers.

84. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

85. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

86. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account

will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

87. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

88. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

89. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

90. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

91. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

92. Instagram users have several ways to search for friends and associates to follow on Instagram, such as by allowing Facebook to access the contact list on their devices to identify which contacts are Instagram users. Facebook retains this contact data unless deleted by the user and periodically syncs with the user's devices to capture changes and additions. Users can similarly allow Facebook to search an associated Facebook account for friends who are also Instagram users.

Users can also manually search for friends or associates

93. Each Instagram user has a profile page where certain content they create and share ("posts") can be viewed either by the general public or only the user's followers, depending on the privacy settings. Users can customize their profile by adding their name, a photo, a short biography ("bio"), and a website address.

94. One of Instagram's primary features is the ability to create, edit, share, and interact with photos and short videos. Users can upload photos or videos taken with or store on their devices, to which they can apply filters and other visual effects, add a caption, enter the usernames of others ("tag"), or add a location. These appear as posts on the user's profile. Users can remove posts from their profiles by deleting or archiving them. Archived posts can be reposted because, unlike deleted posts, they remain on Facebook servers.

95. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Users receive notification when they are "tagged" in a post by its creator or mentioned in a comment (user can "mention" others by adding their username to a comment followed by "@"). An Instagram post created by one user may appear on the profile or feeds of other users depending on several factors including privacy settings and which users were tagged or mentioned.

96. An Instagram “story” is like a post but can be viewed by other users for only 24 hours. Stories are automatically saved to the creator’s “Story Archive” and remain on Facebook servers unless manually deleted. The usernames of those who viewed a story are visible to the story’s creator until 48 hours after the story was posted.

97. Instagram allows users to broadcast live video from their profiles. Viewers can like and add comments to the video while it is live, but the video and any user interactions are removed from Instagram upon completion unless the creator chooses to send the video to IGTV, Instagram’s long-form video app.

98. Instagram’s direct messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, profiles, and other information. Participants to a group conversation can name the group and send invitations to other to join. Instagram users can send individual or group messages with “disappearing” photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders can’t view their disappearing messages after they are sent but do have access to each message status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat with each other directly or in groups.

99. Instagram offers services such as Instagram Checkout and Facebook Pay for users to make purchases, donate money, and conduct other financial transactions within the Instagram platform, Facebook, and other associated websites and apps. Instagram collects and retains payment information, billing records, and transactional and other information when these services are utilized.

100. Instagram has a search function which allows users to search for accounts by username, user activity by location and user activity by hashtag. Hashtags, which are topical words

or phrases preceded by a hash sign (#), can be added to posts to make them more easily searchable and can be “followed” to generate related updates from Instagram. Facebook retains records of a user’s search history and followed hashtags.

101. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

102. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

103. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user’s IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

104. Facebook collects and retains location information relating to the use of an Instagram account, including user-entered location tags and location information used by Facebook to personalize and target advertisements.

105. Social networking providers like Meta Platforms, Inc. typically retain additional information about their users’ accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook or Instagram users may communicate directly with Facebook about issues relating to their accounts,

such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Meta Platforms, Inc. typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

106. As explained herein, information stored in connection with a Facebook or Instagram account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook or Instagram user's IP log, stored electronic communications, and other data retained by Meta Platforms, Inc., can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook or Instagram account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses; investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to "tag" their location in posts and Facebook "friends" to locate each

other. This geographic and timeline information may tend to either inculpate or exculpate the Facebook account owner. Lastly, Facebook or Instagram account activity may provide relevant insight into the Facebook/ Instagram account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook/ Instagram account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

107. Therefore, the computers of Meta Platforms, Inc. are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook/Instagram, such as account access information, transaction information, and other account information.

### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

108. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Meta, Inc. to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B1 and B2. Upon receipt of the information described in Section I of Attachment B1 and B2, government-authorized persons will review that information to locate the items described in Section II of Attachment B1 and B2.

### **CONCLUSION**

109. Based on the foregoing, I request that the Court issue the proposed search warrant.

110. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Meta Platforms, Inc. Because the warrant will be served on Meta Platforms, Inc., who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

111. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

112. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant

## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information associated with the Facebook Username: **Sain Otw** with Account ID: **100008186230246**, the Instagram Username: **2900scamily.sain**, the Instagram account: **mamba\_4200** with Instagram ID# **51476302810**, the Facebook Username: **Abdi Abdi** with Facebook ID: **100064318060237**, the Instagram username: **riodinero.jr** with Instagram ID# **31452828829**, the Instagram username: **Rio.Dinerojr**, the Facebook username “**Jas Kashlyy**” with the Facebook ID: **100044617834049** and the Facebook ID: **100064792601038**, the Instagram username “**jaskashlyy**” with the Instagram ID: **3472618868**, the Instagram Account username: **fraud.corruption** with Instagram ID# **47163873660**, the Instagram username: **29.wiz** with Instagram ID# **31452828829**, the Facebook username: “**Rio Dinero Jr**” with Facebook ID: **100024805427241**, the Facebook username “**riodinero**” with Facebook ID **100052788074944**, the Instagram username: **1am.ri0**, the Instagram username: **john.banks981** with Instagram ID#: **50919630116**, the Instagram username: **bmsm\_east**, and the Instagram username: **riodinero.jr\_** with the Instagram ID: **59392971183** that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered in Menlo Park, California.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Meta Platforms, Inc.**

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta Platforms, Inc. (“Meta”), regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each user ID listed in **Attachment A**:

- (a) All contact and personal identifying information, including the full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers for user Account Name with the Usernames and Account IDs listed in **Attachment A**.
- (b) All activity logs for the account and all other documents showing the user's posts and other Facebook or Instagram activities from **January 1, 2022, to May 9, 2023**;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;
- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook/Instagram group

identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications;

- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user from **January 1, 2022 through May 9, 2023**, including all Messenger activity, private messages, chat history, video and voice calling history, and pending “Friend” requests;
- (g) All “check ins” and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account’s usage of the “Like” feature, including all Facebook posts and all non-Facebook webpages and content that the user has “liked”;
- (j) All information about the Facebook pages that the account is or was a “fan” of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account from **January 1, 2022 through May 9, 2023**;
- (m) All information about the user’s access and use of Facebook Marketplace;
- (n) The types of service used by the user;

- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (p) All privacy settings and other account settings, including privacy settings for individual Facebook/Instagram posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook/Instagram and any person regarding the user or the user's Facebook/Instagram account, including contacts with support services and records of actions taken.
- (r) All content (whether created, uploaded, or shares by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), image stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from **January 1, 2022 to May 9, 2023.**
- (s) All content, records, and other information relating to communications sent from or received by the accounts in Attachment A including by not limited to:
  - a. The content of all communications sent from or received by the Accounts listed in Attachment A, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available.
  - b. All records and other information about direct, group, and disappearing messages sent from or received by the Accounts listed in Attachment A including dates and times, methods, sources, and destinations (including

- usernames and account numbers), and status (such as delivered, opened, replayed, screenshot)
- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants
  - d. All associated logs and metadata,
- (t) All content, records, and other information relating to all other interactions between the Accounts listed in Attachment A and other Instagram users from **January 1, 2022** through **May 9, 2023** including but not limited to:
- a. Interactions by other Instagram users with the Accounts listed in Attachment A or its content, including posts, comments, like, tags, follows (including follows unfollows, approved and denied follow requests, and blocks and unblocks), shares invitations, and mentions
  - b. All users the Accounts listed in Attachment A has followed including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the account
  - c. All contacts and related sync information
  - d. All associated logs and metadata

Meta is hereby ordered to disclose the above information to the government within 10 days of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. § 1951(a) (Hobbs Act robbery), 18 U.S.C. § 924(c) (possessing and/or brandishing a firearm during a crime of violence) involving HUSSEIN HAJI, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- (a) The relevant offense conduct, any preparatory steps taken in furtherance of the scheme, communications between HUSSEIN HAJI, HURIA ABU, JESSIE COOK, and others related to the relevant offense conduct of illegal use and possession of firearms and carjacking;
- (b) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- (c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s); and
- (e) The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the sale of firearms and sale and use of controlled substances, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be

conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS PURSUANT TO**  
**FEDERAL RULES OF EVIDENCE 902(11) AND 902(13)**

I, \_\_\_\_\_, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Facebook, and my title is \_\_\_\_\_. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Facebook. The attached records consist of \_\_\_\_\_ [GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)]. I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Facebook, and they were made by Facebook as a regular practice; and
- b. such records were generated by Facebook's electronic process or system that produces an accurate result, to wit:
  1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Facebook in a manner to ensure that they are true duplicates of the original records; and
  2. the process or system is regularly verified by Facebook, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

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Date

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Signature

May 15, 2023

s/D. Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

In the Matter of the Search of

)

(Briefly describe the property to be searched  
or identify the person by name and address)

)

Case No. 23 MJ 93

information associated with a certain Facebook or Instagram  
user ID that is stored at premises owned, maintained, controlled,  
or operated by Meta Platforms, Inc. ("Meta"), a social networking  
company headquartered in Menlo Park, California.

)

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin  
(identify the person or describe the property to be searched and give its location):

Please see Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

Please see Attachment B.

**YOU ARE COMMANDED** to execute this warrant on or before 5/29/2023 (not to exceed 14 days)

in the daytime 6:00 a.m. to 10:00 p.m.  at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Honorable William E. Duffin  
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box).

for 30 days (not to exceed 30)  until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 5/15/2023 at 11:12 AM

Judge's signature

City and state: Milwaukee, WI
Honorable William E. Duffin, U.S. Magistrate Judge  
Printed name and title

**Return**

Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

*Executing officer's signature*

\_\_\_\_\_  
*Printed name and title*

## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information associated with the Facebook Username: **Sain Otw** with Account ID: **100008186230246**, the Instagram Username: **2900scamily.sain**, the Instagram account: **mamba\_4200** with Instagram ID# **51476302810**, the Facebook Username: **Abdi Abdi** with Facebook ID: **100064318060237**, the Instagram username: **riodinero.jr** with Instagram ID# **31452828829**, the Instagram username: **Rio.Dinerojr**, the Facebook username “**Jas Kashlyy**” with the Facebook ID: **100044617834049** and the Facebook ID: **100064792601038**, the Instagram username “**jaskashlyy**” with the Instagram ID: **3472618868**, the Instagram Account username: **fraud.corruption** with Instagram ID# **47163873660**, the Instagram username: **29.wiz** with Instagram ID# **31452828829**, the Facebook username: “**Rio Dinero Jr**” with Facebook ID: **100024805427241**, the Facebook username “**riodinero**” with Facebook ID **100052788074944**, the Instagram username: **1am.ri0**, the Instagram username: **john.banks981** with Instagram ID#: **50919630116**, the Instagram username: **bmsm\_east**, and the Instagram username: **riodinero.jr\_** with the Instagram ID: **59392971183** that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered in Menlo Park, California.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Meta Platforms, Inc.**

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta Platforms, Inc. (“Meta”), regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each user ID listed in **Attachment A**:

- (a) All contact and personal identifying information, including the full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers for user Account Name with the Usernames and Account IDs listed in **Attachment A**.
- (b) All activity logs for the account and all other documents showing the user's posts and other Facebook or Instagram activities from **January 1, 2022, to May 9, 2023**;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;
- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook/Instagram group

identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications;

- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user from **January 1, 2022 through May 9, 2023**, including all Messenger activity, private messages, chat history, video and voice calling history, and pending “Friend” requests;
- (g) All “check ins” and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account’s usage of the “Like” feature, including all Facebook posts and all non-Facebook webpages and content that the user has “liked”;
- (j) All information about the Facebook pages that the account is or was a “fan” of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account from **January 1, 2022 through May 9, 2023**;
- (m) All information about the user’s access and use of Facebook Marketplace;
- (n) The types of service used by the user;

- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (p) All privacy settings and other account settings, including privacy settings for individual Facebook/Instagram posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook/Instagram and any person regarding the user or the user's Facebook/Instagram account, including contacts with support services and records of actions taken.
- (r) All content (whether created, uploaded, or shares by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), image stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from **January 1, 2022 to May 9, 2023.**
- (s) All content, records, and other information relating to communications sent from or received by the accounts in Attachment A including by not limited to:
  - a. The content of all communications sent from or received by the Accounts listed in Attachment A, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available.
  - b. All records and other information about direct, group, and disappearing messages sent from or received by the Accounts listed in Attachment A including dates and times, methods, sources, and destinations (including

- usernames and account numbers), and status (such as delivered, opened, replayed, screenshot)
- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants
  - d. All associated logs and metadata,
- (t) All content, records, and other information relating to all other interactions between the Accounts listed in Attachment A and other Instagram users from **January 1, 2022** through **May 9, 2023** including but not limited to:
- a. Interactions by other Instagram users with the Accounts listed in Attachment A or its content, including posts, comments, like, tags, follows (including follows unfollows, approved and denied follow requests, and blocks and unblocks), shares invitations, and mentions
  - b. All users the Accounts listed in Attachment A has followed including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the account
  - c. All contacts and related sync information
  - d. All associated logs and metadata

Meta is hereby ordered to disclose the above information to the government within 10 days of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. § 1951(a) (Hobbs Act robbery), 18 U.S.C. § 924(c) (possessing and/or brandishing a firearm during a crime of violence) involving HUSSEIN HAJI, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- (a) The relevant offense conduct, any preparatory steps taken in furtherance of the scheme, communications between HUSSEIN HAJI, HURIA ABU, JESSIE COOK, and others related to the relevant offense conduct of illegal use and possession of firearms and carjacking;
- (b) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- (c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s); and
- (e) The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the sale of firearms and sale and use of controlled substances, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be

conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.